

November 30, 2009

Re: Joint RFI

RIN: 0572-ZA01 / RIN: 0660-ZA28 -Docket No: 0907141137-91375-05

The Honourable Jonathan S. Adelstein,
Administrator, Rural Utilities Service

The Honourable Lawrence E. Strickling,
Assistant Secretary for Communications and Information

Dear Gentlemen,

We thank you for the opportunity to provide feedback and comment on the BIP and BTOP programs to date and how the application process could be amended for the next (and final) round of funding. Considering the likelihood of a high volume of responses to your joint RFI we have made our response as brief as possible.

In brief, our feedback is as follows:

- That in evaluating responses, the ability of the applicant's proposed project to support and include voice services (VoIP) should be taken into account.
- That the BIP and BTOP programs should rationalize on a single set of criteria with respect to funding eligibility – in round 1 BIP allowed funding to cover voice switching equipment but BTOP did not. We would like to see clarification in Round 2 that voice switching equipment is allowed under both programs in recognition of the vital role that VoIP will play in enabling 21st Century Broadband.

What follows is a short discussion setting out the reasons for our views in more detail.

Collaboration and Innovation

We believe that the goal of universal availability and widespread adoption of broadband is absolutely critical for the success of the US both as a competitor in the global marketplace and as a vibrant and evolving society. With higher access speeds and broader adoption the uses of the Internet have evolved. Broadband users now consume richer content from a wider variety of sources but more importantly, they more frequently collaborate to address new world problems with innovative solutions.

Collaboration is also critical to the employment prospects for rural communities by enabling companies to tap the skills of remote workers more easily and effectively. The potential Green benefit of reduced commuter travel is an added plus.

21st Century Telephony

Voice applications are essential to effective collaboration. Clearly traditional wireline and wireless telephony are vital tools in collaboration but there is a new breed of voice applications that enhance collaboration. This new breed of applications which we call 21st Century Telephony is only relevant to broadband users. 21st Century Telephony users can easily route their incoming calls to fixed or mobile endpoints based on calling party, time of day or events on your personal calendar. These users receive voicemail notification on their phone, TV, PC or mobile device. Their voice messages can be retrieved through a variety of channels as the original voice message or transcribed into text. Home and remote workers with 21st Century Telephony are better able to work with their colleagues back at "head office" and to deliver a professional, enterprise-like service to their customers.

The underpinning of 21st Century Telephony is standards based IP/SIP voice technology. Its open interfaces allow third parties to "Mash-up" new applications providing even more value to the end user.

Communities that cannot access these enhanced voice services will suffer economic disadvantage. Therefore, RUS and NTIA should provide favorable consideration for projects that include 21st Century Telephony applications. These projects help satisfy statutory requirements, provide much greater value to the citizens and because of the addition of voice revenues they are more likely to be financially sustainable.

Confusion Concerning BIP and BTOP Requirements

BIP allows for the inclusion of enhanced switching whereas BTOP does not make provisions for applications beyond Internet access. This inconsistency has caused confusion among applicants and their consulting engineers. In response to this inconsistency some first tranche applicants removed capital requests for enhanced switching required for 21st Century Telephony. We feel that this "unintended consequence" is counterproductive. We recommend that both programs accept and fund applications that include capital for enhanced switching. Alternatively the evaluation process for projects that are to be considered by both BIP and BTOP needs to be clarified in regards to how the inclusion of enhanced switching is to be handled without diminishing the applicant's chances for a successful bid for funding.

Not All Broadband is Created Equal

Real-time applications like voice and two-way video require low latency, symmetrical bandwidth. Some broadband access technology cannot support these applications effectively. BIP and BTOP should consider adequacy of proposed technology during the selection process. Preference should be given to the follow technologies in rank order.

- 1.) FTTP;
- 2.) DSL/Cable Modem;
- 3.) 4G Fixed Wireless

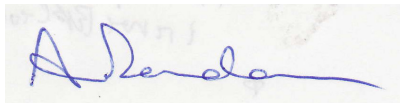
Other technologies do not provided sufficient capacity to support the advancing needs of users for real-time collaboration and should be considered only when one of the preferred access technologies is not available.

Conclusion

21st Century Telephony is essential for collaboration. RUS and NTIA should consider applications that include advanced voice services favorably because of added value and project viability/sustainability. Greater consistency between the two programs in regards enhanced switching would reduce confusion and provide for a better overall outcome.

Thank you for your time in considering our views. The Broadband Stimulus is a vital initiative. We at Metaswitch applaud your and your team's efforts.

Sincerely,



Andrew Randall
Senior Vice President of Marketing & Business Development
Metaswitch, Carrier Systems Division